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November 14, 2002

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: D.T.E. 01-106 – Hearing Officer’s Request for Comments

Dear Secretary Cottrell:

The New England Gas Company (the “Company”) hereby files a brief response to the Request for Comments issued by the Hearing Officer in the above-referenced proceeding (the “Request for Comments”). The Company submitted Initial Comments on January 24, 2002 to the Department of Telecommunications and Energy (the “Department”) in response to the Department’s Order opening a Notice of Inquiry to investigate options to increase the penetration rate for discount programs currently offered to income-eligible residential gas, electric and telephone customers. At that time, the Company described its substantial outreach program to inform customers about its low-income discount rate program, as well as its procedures used to enroll customers into the program.

The Request for Comments seeks responses to issues relevant to the Company’s enrollment procedures. To that end, the Company has reviewed the Response to Hearing Officer’s Request for Comments submitted by the NSTAR companies (“NSTAR”) on this date. The Company concurs with NSTAR’s response as it relates to the “check-off” box option referenced by the Hearing Officer and the Company’s preference for this approach over the “third-party administrator” model, which will likely result in the Company incurring significant costs to start and maintain a uniform customer database, with no incremental benefit over the “check-off” box option.¹ Moreover, the Company would like to

¹ Although the Company’s procedure for enrolling new clients of the Department of Transitional Assistance (the “DTA”) on the Company’s discount rate varies from that used by NSTAR, like NSTAR the Company presumes a customer’s eligibility for its low-income discount rate through the customer’s receipt of a qualifying governmental benefit, including benefits offered by the DTA.

participate in any discussions that the Department coordinates between the Executive Office of Health and Human Services ("EOHHS") and the Massachusetts utility companies regarding the possibility of utilizing the EOHHS' MassCARES web-site to facilitate customer enrollment on the Company's discount rates. This approach is also preferable to creating a database through a third party administrator because, if feasible, it would appear to require far fewer costs than the third-party administrator model, and would likely result in similar benefits vis-à-vis facilitating enrollment on the Company's discount rate.

New England Gas looks forward to discussing these issues further with the Department and interested parties as this proceeding progresses. Should you have questions regarding these comments, please feel free to contact me or Kerry Britland at the following address:

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Thank you for your attention to this matter.

Sincerely,

John K. Habib

Enclosures

cc: Peter Czekanski, Director-Pricing, New England Gas Company
Sharon Partridge, Vice President, New England Gas Company